

McGLINCHEY STAFFORD

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

SHAWNA DERRINGER,

Plaintiff,

v.

QUICKEN LOANS INC.,

Defendant.

Case No.: 3:16-cv-01228-BAS-WVG

Hon. District Judge Cynthia Bashant
Hon. Mag. Judge William V. Gallo

**STIPULATION TO EXTEND TIME
TO RESPOND TO COMPLAINT**

Current Response Date: May 31, 2016

New Response Date: June 30, 2016

State Court Case No.: 37-2016-
00330023-SC-SC-NC

Action Filed: May 4, 2016

Trial Date: NA

This *Stipulation To Extend Time to Respond to Complaint* (the "Stipulation") is entered into by and between *plaintiff* Shawna Derringer ("Plaintiff") in pro per and *defendant* Quicken Loans Inc. ("Quicken Loans," and together with Plaintiff, the "Parties"), by and through its attorneys of record.

I. RECITALS

1. On May 4, 2016, Plaintiff commenced this action by filing a complaint (the "Complaint") against Quicken Loans in the Superior Court of the State of California for the County of San Diego. Quicken Loans removed the Complaint to this Court on May 23, 2016.

2. Quicken Loans is in the process of evaluating the allegations raised in the Complaint and has, accordingly, not yet filed a response to the Complaint.

3. Quicken Loans was unable to make contact with Plaintiff's representative until May 23, 2016. Upon making such contact, Quicken Loans was able to obtain more information that allowed it to identify the loan that is the subject of the Complaint. Quicken Loans was not able to identify the subject loan before May 24, 2016, leaving it with only three business days within which to investigate Plaintiff's claims before its current response deadline. To allow for Quicken Loans to conduct a proper investigation and respond to Plaintiff's claims accurately, the Parties agree to extend the date by which Quicken Loans must respond to the Complaint. This extension is not being requested for purposes of delay and will not result in prejudice to either party.

II. TERMS

The Parties stipulate as follows:

1. Quicken Loans shall have until June 30, 2016, to file and serve its response to the Complaint.

IT IS SO STIPULATED.

DATED: May 25, 2016

By: Shawna Derringer
SHAWNA DERRINGER
Plaintiff *in pro per*

DATED: May 26, 2016

McGLINCHEY STAFFORD

By: /s/ Dhruv M. Sharma
DHRUV M. SHARMA
BRIAN A. PAINO
Attorneys for Defendant **QUICKEN LOANS INC.**

PROOF OF SERVICE

STATE OF CALIFORNIA)
COUNTY OF ORANGE) **ss.**

I, Carol Rico, declare:

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 18201 Von Karman Ave., Suite 350, Irvine, California 92612.

On May 26, 2016, I served the document(s) described as: **STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT** as follows:

☐ **BY MAIL:** As follows:

☐ **FEDERAL** – I deposited such envelope in the U.S. mail at Irvine, California, with postage thereon fully prepaid,

☒ **BY OVERNIGHT COURIER SERVICE** as follows: I caused such envelope to be delivered by overnight courier service to the offices of the addressee. The envelope was deposited in or with a facility regularly maintained by the overnight courier service with delivery fees paid or provided for.

☐ **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I caused said document(s) to be served by means of this Court's Electronic transmission of the Notice of Electronic Filing through the Court's transmission facilities, to the parties and/or counsel who are registered CM/ECF users set forth in the service list obtained from this Court. Pursuant to Electronic Filing Court Order, I hereby certify that the above documents(s) was uploaded to the website and will be posted on the website by the close of the next business day and the webmaster will give e-mail notification to all parties.

☒ **FEDERAL:** I declare that I am employed in the office of a member of the State Bar of this Court at whose direction the service was made.

Executed on May 26, 2016, at Irvine, California.



Carol Rico

SERVICE LIST
USDC, Southern District Case No. 3:16-cv-01228-BAS-WVG
SHAWNA DERRINGER v. QUICKEN LOANS, INC., et al.
File # 102369.0045

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Plaintiff, **In Pro Per**

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